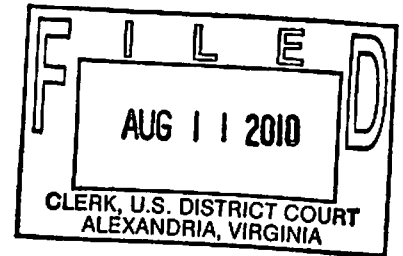


UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)



PARK CENTER ASSOCIATES, LP  
4401 Ford Avenue, Suite 400  
Alexandria, Virginia 22302

-and-

2009 14<sup>th</sup> STREET LLC,  
4401 Ford Avenue, Suite 400  
Alexandria, Virginia 22302

Plaintiffs,

v.

TRAVELERS PROPERTY CASUALTY  
COMPANY OF AMERICA,  
One Tower Square  
Hartford, Connecticut 06183

Defendant.

Case No. 1:10 cv 895 AST/JFA

\* \* \* \* \*

**NOTICE OF REMOVAL**

Defendant, Travelers Property Casualty Company of America ("Travelers"), by its undersigned counsel, file this Notice of Removal of the civil action captioned, *Park Center Associates, LP and 2009 14<sup>th</sup> Street LLC v. Travelers Property Casualty Company of America*, Civil Action No.. 2009-17246, from the Circuit Court of Fairfax County, Virginia, to the United States District Court for the Eastern District of Virginia. This Notice is filed pursuant to 28 U.S.C. §§ 1332(a), 1441(a) and 1446. As grounds for removal, Defendant avers:

1. A copy of all process, pleadings and orders served on the Defendant is annexed hereto as **Exhibit 1** in accordance with 28 U.S.C. § 1446(a).

2. Plaintiff, Park Center Associates, LP, ("PCA") is a limited partnership organized under the laws of the Commonwealth of Virginia with its principal place of business located in Alexandria, Virginia.

3. Plaintiff, 2009 14<sup>th</sup> Street LLC, is a Virginia limited liability company organized under the laws of the Commonwealth of Virginia with its principal place of business located in Alexandria, Virginia.

4. Defendant, Travelers, is an insurance company organized under the laws of the State of Connecticut with its principal place of business located in Hartford, Connecticut.

5. The matter in controversy in this case exceeds the sum or value of \$75,000.

6. There is complete diversity between the Plaintiffs and the Defendant.

7. Plaintiff filed the action in the Virginia state court on or about April 14, 2010.

8. On July 22, 2010, a copy of the Complaint and a summons naming Defendant Travelers was served on its resident agent CSC.

9. Defendant Travelers hereby removes the action filed in the Circuit Court of Fairfax County, Virginia and submits this Notice, with attachments, in accordance with 28 U.S.C. § 1446.

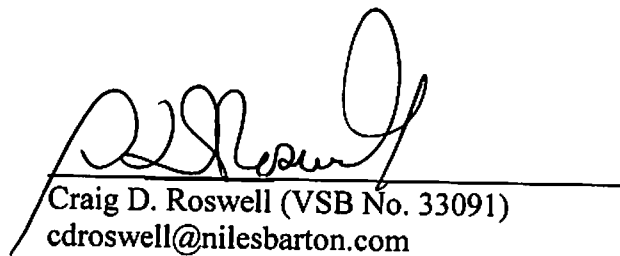
10. This Notice is being filed within the earlier of 30 days after service of the summons or of the initial pleading filed by the Plaintiffs and is timely filed under 28 U.S.C. § 1446(b).

11. Defendant Travelers hereby certifies in accordance with 28 U.S.C. § 1446(d), that written notice of the filing of this Notice of Removal will be served promptly on all adverse parties and, together with a copy of this Notice of Removal and supporting papers, will be filed with the Clerk of the Circuit Court of Fairfax County, Virginia.

12. Defendant Travelers requests a waiver of any bond requirements.

**WHEREFORE**, this Court has jurisdiction pursuant to 28 U.S.C. § 1332(a) based on the diversity of citizenship between the Plaintiffs and Defendant and the amount in controversy, and removal is appropriate pursuant to 28 U.S.C. § 1441(a), and Defendant Travelers respectfully requests removal of the action to this Court.

Respectfully submitted,  
THE TRAVELERS PROPERTY CASUALTY  
COMPANY OF AMERICA  
*By Counsel:*

A handwritten signature in black ink, appearing to read "Craig D. Roswell", is written over a horizontal line.


Craig D. Roswell (VSB No. 33091)  
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111 S. Calvert Street, Suite 1400  
Baltimore, Maryland 21202  
(410) 783-6300  
(410) 783-6363 facsimile

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of August, 2010, copies of the foregoing  
Notice of Removal and all Exhibits were sent via Federal Express, postage prepaid, to:

Savalle C. Sims, Esquire, VSB #39274  
Deanne M. Ottaviano, Esquire  
ARENT FOX LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5339  
*Counsel for the Plaintiffs*

Civil Clerk  
Circuit Court of Fairfax County  
4110 Chain Bridge Road  
Fairfax, Virginia 22030



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